



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

February 7, 2002

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon
Black Sand Removal

Dear Mr. Cusma:

Thank you for submitting the January 11, 2002 *Draft Black Sand Removal Action* report for the above-referenced site. The Department of Environmental Quality (DEQ) has reviewed this document and has the following comments.

1. Figure 1-2. Please revise the figure to show the actual location of the excavated sand/soil stockpile.
2. Section 4.1. Post-excavation soil confirmation samples were not collected in the top of bank area. While the objective of top of bank soil excavation was primarily to remove surficial source material prone to erosion, the nature and extent of remaining black sand in the upland site needs to be defined.
3. Table 4-2. To facilitate data evaluation, please add DEQ's Ecological Risk Level II Screening Level Values (SLVs, <http://www.deq.state.or.us/wmc/documents/eco-2slv.pdf>) for freshwater sediment and summations for concentrations of low, high, and total polycyclic aromatic hydrocarbons (PAHs) to the data table. From Figure 4-2, it appears that the SLV for total PAHs was exceeded in four central bottom samples and five perimeter confirmation samples in the beach excavation.
4. Table 4-3 Levels of polychlorinated biphenyls (PCBs) were below the sediment SLV in the beach excavation.
5. Table 4-4 Concentrations of chromium, copper, and nickel in most confirmation samples in the beach excavation exceeded SLVs, and about half of the samples exceeded lead and zinc SLVs. The source of the elevated metal levels is not clear, particularly for copper, which showed concentrations that were significantly higher than previously observed at the subject site.

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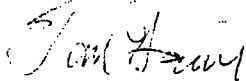
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6. In general, post-excavation confirmation samples indicate that levels of PAHs and metals in remaining beach material are of potential concern for ecological receptors. The document does not include discussion of results, conclusions, or recommendations. DEQ understands that a document addressing the entire subject site will be submitted in the near future and that potential future actions will be discussed.

Please call me at 503-229-5326 if you have questions.

Sincerely,



Tom Gainer, P.E.
Project Manager
Cleanup and Portland Harbor

cc: Ross Rieke, Bridgewater Group
Rod Struck, CU/PH
Eric Blischke, CU/PH

